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# IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH

## UNITED STATES OF AMERICA,

Plaintiff,

VS.

BRIAN REEVE,

Defendant.

# **INDICTMENT**

Count 1: 18 U.S.C. § 2251(a) and (e), Production of Child Pornography

Count 2: 18 U.S.C. § 2252A(a)(5)(B), Possession of Child Pornography

Case: 4:25-cr-00004

Assigned To: Allen, Ann Marie Mclff

Assign. Date: 1/28/2025

The Grand Jury charges:

#### COUNT 1

18 U.S.C. § 2251(a) and (e) and § 2 (Production of Child Pornography)

Beginning on a date unknown and continuing through October 22, 2024, in the District of Utah,

### BRIAN REEVE,

defendant herein, did employ, use, persuade, induce, entice and coerce a minor, "Victim," to engage in sexually explicit conduct for the purpose of producing any visual depiction

of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and attempted to do so; all in violation of 18 U.S.C. § 2251(a) and (e).

#### COUNT 2

18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (Possession of Child Pornography)

On a date unknown, continuing through October 22, 2024, in the District of Utah, BRIAN REEVE,

defendant herein, did knowingly possess and access with intent to view any material which contains an image of child pornography, involving a minor who had not attained 12 years of age, as defined in 18 U.S.C. § 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer, and attempted to do so; all in violation of 18 U.S.C. § 2252A(a)(5)(B), and § 2252A(b)(2).

#### NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 2253, upon conviction of any offense violating 18 U.S.C. §§ 2251, and 2252A, the defendant shall forfeit to the United States of America: (i) any visual depiction described in 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of this chapter; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property to be forfeited includes, but is not limited to:

- Black Fujifilm Finepix S1000 digital camera;
- Three Olympus XD picture cards, 2GB in size;
- Panasonic 750X VHS Camcorder bearing serial number D21A14242;
- Two compact VHS cassettes;
- Motorola phone model XT2413V and bearing IMEI 352036364830180;
- Toshiba laptop bearing serial number X8474730Q;
- HP Officejet J4680 printer;
- Various photographs; and

■ Substitute property as allowed by 21 U.S.C. § 853(p) and 18 U.S.C. § 2253(b).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

TRINA HIGGINS United States Attorney

CHRISTOPHER BURTON

Assistant United States Attorney